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Attorneys for Defendant

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

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17 SVETLANA BLACKBURN,

18 Plaintiff,

19 vs.

20 ORACLE AMERICA, INC.,

21 Defendant.
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Case No. 3:16-cv-02925-EMC

**[PROPOSED] STIPULATED RULE
502(d) ORDER**

Hon. Edward M. Chen
Action Filed: June 1, 2016

I. PURPOSE

This Stipulated Order will govern discovery of electronically stored information (“ESI”) in this case as a supplement to the Federal Rules of Civil Procedure, this Court’s Guidelines for the Discovery of Electronically Stored Information, and any other applicable orders and rules.

II. DOCUMENTS PROTECTED FROM DISCOVERY

(1) The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

(2) Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privilege and/or protected information before productions.

IT IS SO STIPULATED.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: November 28, 2016

VELTON ZEGELMAN P.C.

By: /s/ Daniel Velton

DANIEL VELTON
Attorneys for Plaintiff

Dated: November 28, 2016

ORRICK HERRINGTON & SUTCLIFFE, LLP

By: /s/ Michael Delikat

MICHAEL DELIKAT
Attorneys for Defendant

Filer’s Attestation: Pursuant to Civil Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from its signatory.

1 Dated: November 28, 2016

Respectfully submitted,

2 /s/ Michael Delikat
3 MICHAEL DELIKAT

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5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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7 Dated: 11/29/2016

8 Hon. Edward M. Chen
9 United States District Judge

